



Alan C. Lloyd, Ph.D.
Agency Secretary

Air Resources Board

Robert F. Sawyer, Ph.D., Chair
1001 I Street • P.O. Box 2815
Sacramento, California 95812 • www.arb.ca.gov



Arnold Schwarzenegger
Governor

March 17, 2006

06-01

Paul C. Bauer
Technical Services Manager
Healy Systems, Inc.
18 Hampshire Drive
Hudson, New Hampshire 03051

Dear Mr. Bauer:

Thank you for your letter, dated February 13, 2006, requesting approval from the Air Resources Board (ARB) to utilize portions of existing dispenser vapor piping in Dresser Wayne (Wayne-Vac) and Gilbarco (VaporVac) dispensers when retrofitting to Executive Order G-70-191-AA (Healy ORVR Phase II Vapor Recovery System). You stated in your letter that there is a substantial amount of existing vacuum assist systems being converted to Executive Order G-70-191-AA in order to meet the requirements for ORVR compatibility. Executive Order G-70-191-AA currently states that the Healy ORVR Phase II Vapor Recovery System can be installed on any ARB certified balance vapor ready dispenser and that conversion kits can be used to retrofit non-vapor-ready dispensers. The Executive Order does not specify the retrofitting of ARB certified vacuum assist vapor ready dispensers.

You provided information in your letter stating the vapor piping dimensions for both the Dresser Wayne (Wayne-Vac) and Gilbarco (VaporVac) dispensers. The minimum vapor tubing outside diameter used in the dispensers for the Wayne-Vac system is 0.500 inches with a 0.040 inch wall thickness. This corresponds to a vapor tubing inside diameter of 0.420 inches. The minimum vapor tubing outside diameter used in the dispensers for the VaporVac system is 0.500 inches with a 0.035 inch wall thickness. This corresponds to a vapor tubing inside diameter of 0.430 inch.

During the certification of the Healy EVR systems, Executive Orders VR-201-A (Healy only) and VR-202-A (Healy with In-Station Diagnostics), ARB staff conducted challenge mode testing that involved the use of a Healy 75B series vapor recovery hose of approximately thirty (30) feet in length and a vapor tubing inner diameter of 0.3125 inch. During that testing, the Healy VP1000 vacuum pump demonstrated that the additional inner hose diameter restriction did not affect the ability of the nozzle to collect vapors from a vehicle fueling event. This testing also demonstrated that unrealistically high volumes of liquid blockages could be cleared from the hose (above 15 fluid ounces).

The energy challenge facing California is real. Every Californian needs to take immediate action to reduce energy consumption. For a list of simple ways you can reduce demand and cut your energy costs, see our website: <http://www.arb.ca.gov>.

California Environmental Protection Agency

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Based upon the performance of this challenge mode testing, ARB approves the use of existing dispenser vapor piping in Wayne-Vac and VaporVac dispensers when retrofitting to Executive Order G-70-191-AA (Healy ORVR Phase II Vapor Recovery System). Lastly, the components listed in Executive Order G-70-191-AA and all approval letters pertaining to it, through the provisions provided in Section 19.1.4 of CP-201, may remain in use for the remainder of its useful life or the allowable in-use period.

If you have questions or need further information regarding this approval, please contact Paul Marzilli at (916) 445-7431 or via email at pmarzill@arb.ca.gov or Pat Bennett at (916) 322-8959 or via email at pbennett@arb.ca.gov.

Sincerely,



William V. Loscutoff, Chief
Monitoring and Laboratory Division

cc: Brian Aunger
San Luis Obispo County APCD

Jim Swaney
San Joaquin Air Pollution Control District

Jeannette Lim
Bay Area Air Quality Management District